UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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ROSIE MARTINEZ,

                                  Plaintiff,

                  -against-

CITY OF NEW YORK, ERIC RYAN, DAVID CAMHI,
JOSEPH DIGENNARO, KEITH LALIBERTE,

                                Defendants.

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DECLARATION OF KAVIN THADANI IN SUPPORT OF DEFENDANTS' MOTION FOR REMITTITUR

16 CV 79 (NRM) (CLP)

       KAVIN THADANI, an attorney duly admitted to practice in the Courts of New York, declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following statements are true:

       1.   I am a Senior Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and an attorney for defendants City of New York, Eric Ryan, David Camhi, Joseph DiGennaro, and Keith Laliberte. As such, I am familiar with the facts and circumstances stated herein and submit this declaration to place the relevant documents on the record in support of defendants' motions for remittitur.

       2.   Annexed hereto as Exhibit "A" is a copy of excerpts of plaintiff's December 8, 2022 trial testimony, specifically pages 44-46 and 108-109.

       3.   Annexed hereto as Exhibit "B" is a copy of plaintiff's Correctional Health Services Pre-Arraignment Screening Form, entered into evidence at trial as Defendants' Exhibit AA.

       4.   Annexed hereto as Exhibit "C" is a copy of plaintiff's Medical Treatment of Prisoner Form, entered into evidence at trial as Plaintiff's Exhibit 20.

5.   Annexed hereto as Exhibit "D" is a copy of excerpts of plaintiff's Queens Hospital Center medical records, entered into evidence at trial as Plaintiff's Exhibit 5, specifically pages bates-stamped DEF000058, DEF000060, DEF000065, DEF000075, DEF000077, and DEF000078.

Dated: New York, New York
       January 27, 2023

HON. SYLVIA O. HINDS-RADIX
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Attorney for Defendants
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New York, New York 10007
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By: */s/ Kavin Thadani*
         Kavin Thadani
         Senior Counsel
         Special Federal Litigation Division

TO: **VIA ECF**
       Gabriel Harvis, Esq.
       Baree Fett, Esq.
       Wayne Wattley, Esq.
       Attorneys for Plaintiff